IN THE UNITED STATES PATENT AND TRADEMARK
OFFICE BEFORE THE BOARD OF PATENT APPEALS
AND INTERFERENCES

Appl. No.   : 09/772,477
Appellant(s) : HOLTSLAG, Antonius H., et al.
Filed   : 29 January 2001
Title   : METHOD OF DISPLAYING IMAGES
                ON A MATRIX DISPLAY DEVICE

TC/A.U.   : 2675

Examiner   : NELSON, Alecia Diane

Atty. Docket : PHNL 000025

APPELLANT'S REPLY

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Commissioner for Patents
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Sir:

APPELLANT'S REPLY TO EXAMINER'S ANSWER

        This Reply Brief of Appellant is in response to the
Examiner's Answer dated 12 September 2006, which was in
response to Appellant's Appeal Brief dated 7 April 2004.

With respect to the rejection of claims 1, 3, 5 and 8 under 35 USC 103(a) as being unpatentable over Wani in view of Kida, the Examiner has stated that Wani teaches partial interlace scanning in the lower bits in order to reduce addressing time, while Kida teaches assigning the same luminance values to neighboring lines, also in order to reduce addressing time.

However, by assigning the same luminance value to neighboring lines, and addressing these neighboring lines together as a unit, Kida is converting the interlaced scan signal to a progressive scan signal. See col. 7, lines 14-17.

Moreover, Kida makes no distinction between subfields having most or least significant bits. In fact, applying Kida's technique to only some of the subfields would not convert the interlaced scan signal to a progressive scan signal.

Thus, the skilled artisan would not be led by Kida to drive neighboring rows of only some of the subfields, i.e., the lower four bits of the Wani signal, at the same luminance value, and accordingly the combination of Wani and Kida fails to teach or suggest Appellant's claimed invention.

However, nothing in either of the cited references teaches or suggests the result urged by the Examiner. As already explained, in failing to discriminate between most significant bits and least significant bits, Kida would actually result in greater degradation in picture quality than Wani.

It can only be with the aid of hindsight gained from Appellant's own teachings that the addressing of the same or average luminance date to adjacent lines of only the least significant subframes becomes obvious, and such hindsight is not permitted in judging obviousness under Section 103.

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Moreover, Appellant's invention, as set forth in claim 1, is further characterized in that such addressing is performed differently for (i) successive frames or fields and/or (ii) for different regions of the display device and/or (iii) for different subfields.

The Examiner has stated that such variations would have been obvious because 'Kida ... addresses neighboring lines with the same luminance value in successive frames or fields, for different regions of the display, or for different subfields.' (EX. ANS., page 4)

However, Kida does not address neighboring lines differently for different regions of the display, or for different subfields, as specifically called for by Appellant's claim 1.

It can only be with the aid of hindsight gained from Appellant's own teachings that the addressing differently for different regions of the display, or for different subfields, becomes obvious, and such hindsight is not permitted in judging obviousness under Section 103.

Accordingly, claims 1, 3, 5 and 8 are not obvious in view of the combination of Wani in view of Kida, and the rejection is in error and should be reversed.

With respect to the rejection of claim 4 under 35 USC 103(a) over Wani in view of Kida and further in view of Huang, the Examiner has stated that Huang teaches dividing the scanning lines into three or more groups.

It is true that Huang divides the scanning lines into groups, e.g., two groups, in which one group includes odd scanning lines, and the other group includes even scanning lines. Huang also teaches that there may be three or more groups of lines. See para. [0020].

However, Huang does not teach or suggest that the groups are limited to three lines, as specifically called for by claim 4.

Accordingly, claim 4 is patentable over the combination of Wani, Kida and Huang, and it is urged that the rejection is in error and should be reversed.

With respect to the rejection of claim 6 under 35 USC 103(a) over Wani in view of Kida and further in view of Nagai, the Examiner has stated that Nagai teaches in Fig. 12 display lines divided into an upper half and a lower half.

While it is true that Nagai discloses a matrix display divided into an upper half (Ya) and a lower half (Yb), nevertheless claim 6 is patentable by virtue of its dependency on claim 1.

Accordingly, it is urged that the rejection is in error and should be reversed.

With respect to the rejection of claim 7 under 35 USC 103(a) over Wani in view of Kida and further in view of Prince, the Examiner has stated that Prince teaches that the number of row electrodes forming each group and the algorithm for changing the groupings of row electrodes in subsequent addressing cycles can be varied.

However, stating that the grouping of electrodes can be varied, without more, does not imply that the variation be carried out in a random manner, as specifically called for by claim 7.

It is therefore urged that the rejection of claim 7 is in error and should be reversed.
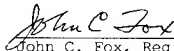
CONCLUSION

It has been shown that the claimed invention distinguishes patentably over the teachings of the prior art references as applied in each of the rejections of claims under 35 USC 103(a). Accordingly, it is urged that each of the rejections is in error, and Appellant respectfully requests that the Board reverse the Examiner's final rejection and direct that the Application proceed to Issue.

Respectfully submitted,

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